

# **Exhibit 1**

**Andersen - Additional Information Requested**

Justin Penn to: Mark Vavreck  
Bcc: "Ari Derman", Candy Velazquez

01/30/2014 11:31 AM

Mark-

As a follow up and in response to the additional information you requested, please accept this email. I will also send over some more documents, but I will do that in separate emails. Like last time, I will send you a confirming email at the end to tell you how many emails with attachments you should have received.

As a housekeeping matter, your notice of deposition has a rider that asks that my client bring in all of the documents produced in this case and all documents covered by any topic. As to the former, you have them all electronically, so he will not be bringing them due to the volume. As to the latter, we object as overly broad, vague and unduly burdensome. That said, if you would like me to print anything within reason of the electronic stuff I have sent you, obviously that will not be a problem.

As to the supplements, I have confirmed that the names in the messages left for Mr. Andersen are pseudonyms and those names do not represent an actual person/employee at Harris. Second, there are three individuals who were involved in collection of Mr. Andersen's account: Eric Howell, Niel Shannof, and Edwin Gomez. Mr. Gomez is the individual in the recording, and he still works at Harris. The other two collectors no longer work at Harris. I am still waiting for their last known address, and will send it promptly upon receipt.

I confirmed also that the notes reflect all calls made to Mr. Andersen are reflected in the notes sent to yo. In other words, those notations reflect calls made, not loads to the dialer. There are no documents reflecting loads to the dialer (the type of documents you indicated, for example, that could be generated by a "Control-P" command). Obviously, my client will be able to confirm that at the deposition.

We also have more information that we received yesterday from WE Energies. You asked for the name of an individual. We have been in contact with Tim Brown, the Operations Manager - Credit and Collections. His phone number is 414- [REDACTED]. I will send you the information that WE Energies provided in a separate email.

As to the persons identified, we expect that Mr. McLean and the bank representative will give testimony and evidence support our affirmative defenses. In particular, we expect Mr. McLean will testify that Mr. Andersen has fabricated lawsuits in the past and harassed other debt collectors into paying Mr. Andersen and him money to settle fabricated claims. In addition, we expect the bank representative to testify as to the amount and frequency of settlement checks Mr. Andersen has cashed.

I also confirmed that to the extent there were modifications to any of the documents produced, Harris no longer has the prior versions. Also, the dates on the documents are accurately reflections of the date of the document.

I tried to call you earlier to finalize/discuss the issue with respect to the contract, and I am around all day today to discuss at your convenience. Also, kindly confirm when you have received the flash drive.

Justin

**Justin Penn**  
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